

**Exhibit 1**

**Stipulation**

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In re	)	Chapter 11
	)	
ZYMERGEN INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 23-11661 (KBO)
	)	
Debtors.	)	(Jointly Administered)
	)	
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**STIPULATION EXTENDING TIME FOR U.S. SECURITIES  
AND EXCHANGE COMMISSION TO FILE A PROOF OF CLAIM**

**WHEREAS**, on October 3, 2023, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) commenced these chapter 11 cases;

**WHEREAS**, on October 31, 2023, the Court entered an Order (Dkt. 124, the “Bar Date Order”), which, among other things, established April 1, 2024 as the deadline by which a governmental unit must file a proof of claim in respect of a prepetition claim against any of the Debtors (the “Government Bar Date”);

**WHEREAS**, on February 5, 2024, the Court entered an Order (Dkt. 372, the “Confirmation Order”) confirming the Debtors’ *First Amended Joint Chapter 11 Plan of Liquidation*, dated February 1, 2024 (the “Plan”). The Plan became effective on February 23, 2024 (the “Effective Date”);

**WHEREAS**, on the Effective Date, the ZYM Liquidating Trust (the “Liquidating Trust”) was established and the Liquidation Trust Assets (as defined in the Plan) were transferred to the Liquidating Trust for the benefit of the Liquidation Trust Beneficiaries (as defined in the Plan).

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<sup>1</sup> These chapter 11 cases are now being administered by the ZYM Liquidating Trust, pursuant to the terms of the Liquidating Debtors’ *First Amended Joint Chapter 11 Plan of Liquidation* (D.I. 372-1). The ZYM Liquidating Trust’s mailing address is 500 West Cypress Creek Road, Ste 400, Fort Lauderdale, FL 33309.

Pursuant to the Confirmation Order, Neal Goldman (the “Liquidating Trustee”) was appointed as the trustee for the Liquidation Trust;

**WHEREAS**, the Liquidating Trustee has retained the law firm of Morris, Nichols, Arsht & Tunnell LLP to represent him in connection with his duties as Liquidating Trustee;

**WHEREAS**, staff of the U.S. Securities and Exchange Commission (the “Commission”) has informed the Liquidation Trustee, through his counsel, that the Commission may assert one or more claims against the Debtors. Counsel for the Liquidating Trustee and Commission staff are presently in discussions regarding such claims;

**WHEREAS**, the Liquidating Trustee and the Commission have agreed to extend the Government Bar Date, solely as it applies to the Commission, through and including April 15, 2024, without prejudice to the Commission’s right to seek further extensions of the Government Bar Date, and without prejudice to the rights of the Liquidating Trustee to oppose any such extensions (the “Stipulation”);

**NOW, THEREFORE**, the Liquidating Trustee and the Commission have STIPULATED AND AGREED to extend the Government Bar Date, solely as it applies to the Commission, through and including April 15, 2024, without prejudice to the Commission’s right to seek further extensions of the Government Bar Date, and without prejudice to the rights of the Liquidation Trustee to oppose any such extensions..

*[Signature Page Follows]*

Dated: March 26, 2024  
Wilmington, Delaware

/s/ David W. Baddley

**U.S. SECURITIES & EXCHANGE COMMISSION**

David W. Baddley (admitted per L.R. 9010-1(e)(1))

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